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EX PARTE OR LATE FILED

March 22, 1999

Via Federal Express 2-Day Air

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 -12th Street, SW
Washington, DC 20554

Re: Ex Parte
CC Docket No. 94-102 – FCC E911 Order

Dear Ms. Salas:

Pursuant to Commission's Rule Section 1.1206, enclosed for filing in the above-referenced docket, please find two (2) copies of letters sent on behalf of Integrated Data Communications to the Telecommunications Legislative Assistants to House and Senate members on the Hill, with attachments.

If you have any questions on this matter, please feel free to contact me at (206) 623-4711. Thank you.

Very truly yours,

ATER WYNNE LLP

Angela Wu

attachments
cc: Tom Sugrue, Wireless Bureau Chief
Kathleen O'Brien Ham, Deputy Chief – Wireless Bureau
John J. Cimko, Jr., Bureau Chief, Policy Division – Wireless Bureau
Nancy Boocker, Deputy Bureau Chief, Policy Division – Wireless Bureau
Daniel Grosh, Policy Division – Wireless Bureau
Ari Fitzgerald, Legal Advisor to Chairman Bill Kennard
Paul Misener, Legal Advisor to Commissioner Harold Furchtgott-Roth
Peter Tenhula, Legal Advisor to Commissioner Michael Powell
Karen Gulick, Legal Advisor to Commissioner Gloria Tristani
Dan Connors, Legal Advisor to Commissioner Susan Ness

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March 19, 1999

Via Federal Express 2-Day Air

Ms. Monica Azare
Telecommunications Legislative Assistant
Office of Rep. W.J. Tauzin
2183 Rayburn HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Ms. Azare:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

IDC's technology works with all wireless interface standards currently employed in the industry (i.e., GSM, TDMA, CDMA, iDEN and AMPS). IDC's technology is capable of transmitting location data on the same channel that carries voice. This means no network modification is needed because IDC's technology does not use an overhead control channel. IDC's technology is compatible with both existing and new PSAP call taker equipment. This means that a carrier using IDC's technology can offer the same level of service on day one of implementation. Thus, the capital investment by wireless or wireline carriers is negligible.

Based on some of the questions that were asked by certain House members on HR 438, there appear to be three major concerns about how wireless carriers will meet the FCC's E911 requirements for Phase II:

1. There is no existing technology today, either network or handset-based, that can meet the FCC's E911 Phase II requirements;

2. Handset technology cannot accommodate roamers who use a network-based solution; and

3. Handset-based approach is only available for new handsets with built-in GPS technology.

IDC wishes you to know that compliance with the FCC's E911 Phase II requirements by the current deadline is possible for all handsets, particularly because retrofit options are possible, and are likely to be available soon. IDC addresses the concerns listed above in this letter, and attached is supportive documentation based on a field test conducted by IDC with the King County E911 Program Office in Washington State.

1. <u>The Technology Exists Today to Meet the FCC's E911 Phase II Requirements</u>

a. Accuracy and Reliability - Results of IDC's Field Test

IDC conducted a six-month field test of its technology in Washington State in cooperation with US West, three national local wireless carriers, and the King County E911 Program Office – 14 organizations in all. Based on the results of its field test, IDC was able to tell the FCC in its meeting that IDC's technology can locate a wireless handset over 90% of the time, using the FCC's RMS measure.

IDC's technology was able to locate a wireless handset within 40 to 70 feet, 70 to 80% of the time. In the other 20 to 30% of the time, IDC's technology could locate a wireless handset well within the FCC's requirements of 125 meters (406 feet). IDC's field test included mountainous terrain, rural, suburban and urban canyons. IDC's presentation (see attached) compares an area around Washington, D.C. to a similar geographic area for IDC's field test in Washington State.

b. Accuracy and Reduced Response Time

As you know, getting emergency assistance within the golden hour (i.e., 50 minutes) is key to saving lives. One of the benefits to accuracy within 40 feet is the improved ability of the PSAP to direct an emergency service call to the closest emergency personnel, thus reducing response time.

IDC's technology has the ability to locate a wireless handset within 40 feet and enables the PSAP to see, for example, that the caller is on a side street and not on a major highway.

When the FCC's requirement of 125 meters (406 feet) is used, a PSAP would not be able to quickly determine whether the caller was calling from a highway or a residential street. Knowing whether the call is from the highway or a residential street makes a difference to the appropriate PSAP (e.g., the State highway patrol or the local sheriff). Just as "accuracy = saving time = saving lives" to the PSAP, appropriate PSAP routing also eliminates precious seconds of response time. It also saves money by minimizing the duplication of effort in the instance of calls near adjoining jurisdictions.

IDC's technology provides the location information from the time of the call to the PSAP, adding less than one and a half seconds to call set-up. And, the data can be transferred along with the call to another jurisdiction or to other response personnel.

2. Roaming

IDC's technology provides two economical solutions for callers that leave their home market and roam to an outside market without a handset solution. First, if that caller has IDC's technology in the handset, and because IDC's technology provides location information in the voice channel, any PSAP can purchase a low priced IDC receiver unit which will enable that PSAP to receive and translate that caller's location information. Second, if a PSAP does not have IDC's receiving unit when a caller roams to an outside market without a handset solution, and that caller does not have IDC's technology in the handset, the call will default to providing location information based upon cell site and sector location information (the Phase I requirement).

3. Existing Handsets

IDC's technology uses an onboard GPS processor chip and antenna. Therefore, its technology can easily be built into the handset, and put into future handsets. More importantly, however, as there are over 69 million wireless handsets in the market today, IDC's technology also works with existing handsets. IDC offers two economical solutions to the existing handset issue. First, the GPS processor and antenna can be built into the battery. Consumers can purchase a new battery for a

low cost. Second, the GPS chip can slide between a wireless handset and its battery on a credit card thin "sleeve" for a low cost.

a. Rural Areas

Finally, the handset technology is very appropriate to the rural PSAP and wireless user. While network-based solutions require at least 2 cell sites or sectors to obtain a less-accurate location, the handset only requires the availability of the voice channel. Furthermore, this voice channel could be any analog or digital air interface.

Given the considerable acreage in the United States serviced by analog cellular – and often with 1 only cell site – the IDC solution is an immediate, low-cost solution that can be implemented in rural areas just as quickly as the more densely-populated areas. The rural users of wireless are often the final adopters of technology. The IDC solution offers "head of the line" privileges to the rural PSAP and wireless user.

I hope this letter, and the attached information, is helpful to you. IDC's technology provides an end-to-end solution for wireless carriers who need to meet the FCC's E911 Phase II requirements by the October 1, 2001 deadline. The results of IDC's field test reflect a level of accuracy and reliability needed by PSAPs, and can fully satisfy the FCC's E911 requirements for Phase II. And, IDC's technology is available today – for rural, suburban, and urban areas. If you have any questions, please feel free to call me at 206.623.4711.

Very truly yours,

ATER WYNNE LLP

Angela Wu

attachments
cc: Dan A. Allen, President & CEO
Dan A. Preston, Co-founder & CTO

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Bryan Jacobs
Telecommunications Legislative Assistant
Office of Rep. Barbara Cubin
1114 Longworth HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Mr. Jacobs:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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Based on some of the questions that were asked by certain House members on HR 438, there appear to be three major concerns about how wireless carriers will meet the FCC's E911 requirements for Phase II:

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March 19, 1999

Via Federal Express 2-Day Air

Ms. Wendi Lynagh
Telecommunications Legislative Assistant
Office of Rep. James Rogan
502 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Ms. Lynagh:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Ms. Mona Willens
Telecommunications Legislative Assistant
Office of Rep. John Shimkus
513 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Ms. Willens:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Luke Rose
Telecommunications Legislative Assistant
Office of Rep. Heather Wilson
2404 Rayburn HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Mr. Rose:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Mike Chappell
Telecommunications Legislative Assistant
Office of Rep. Charles Pickering
427 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Mr. Chappell:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Eugene Patrone
Telecommunications Legislative Assistant
Office of Rep. Vito Fossella
2411 Rayburn HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Mr. Patrone:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Don Dutton
Telecommunications Legislative Assistant
Office of Rep. Roy Blunt
508 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Mr. Dutton:

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March 19, 1999

Via Federal Express 2-Day Air

Mr. James Scholtes
Telecommunications Legislative Assistant
Office of Rep. Robert Ehrlich
315 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Mr. Scholtes:

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Bill Dolbow
Telecommunications Legislative Assistant
Office of Rep. Tom Bliley
2409 Rayburn HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Mr. Dolbow:

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Colin Crowell
Telecommunications Legislative Assistant
Office of Rep. Edward Markey
2133 Rayburn HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and Effective Solution for Rural Areas"

Dear Mr. Crowell:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Ms. Robin Meagher
Telecommunications Legislative Assistant
Office of Rep. Bart Gordon
2201 Rayburn HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Ms. Meagher:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Yardly Pallas
Telecommunications Legislative Assistant
Office of Rep. Bobby Rush
131 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Pallas:

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Based on some of the questions that were asked by certain House members on HR 438, there appear to be three major concerns about how wireless carriers will meet the FCC's E911 requirements for Phase II:

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Bill Bates
Telecommunications Legislative Assistant
Office of Rep. Anna Eshoo
308 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Bates:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. David Toomey
Telecommunications Legislative Assistant
Office of Rep. Eliot Engel
2303 Rayburn HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Toomey:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Ms. Lisa McAlpine
Telecommunications Legislative Assistant
Office of Rep. Albert Wynn
407 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Ms. McAlpine:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Bob Decheine
Telecommunications Legislative Assistant
Office of Rep. Bill Luther
117 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Decheine:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Peter Madaus
Telecommunications Legislative Assistant
Office of Rep. Ron Klink
125 Canon HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Madaus:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Derrick Owens
Telecommunications Legislative Assistant
Office of Rep. Thomas Sawyer
1414 Longworth HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Owens:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Rob Nichols
Telecommunications Legislative Assistant
Office of Senator Slade Gorton
730 Hart Senate Office Building
Washington, DC 20510

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Nichols:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Ms. Renee Bennett
Telecommunications Legislative Assistant
Office of Senator Trent Lott
487 Russell Senate Office Building
Washington, DC 20510

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Ms. Bennett:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Ms. Lori Sharpe
Telecommunications Legislative Assistant
Office of Senator John Ashcroft
316 Hart Senate Office Building
Washington, DC 20510

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Ms. Sharpe:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Bill Anaya
Telecommunications Legislative Assistant
Office of Rep. John Dingell
2328 Rayburn HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Anaya:

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Andy Walker
Telecommunications Legislative Assistant
Office of Rep. Karen McCarthy
1232 Longworth HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Walker:

Integrated Data Communications (IDC) is concerned about some of the perceptions surrounding the handset-based approach to meeting the FCC's E911 Phase II requirements. IDC is interested in this issue because it has developed a signaling protocol that uses MF in-band signaling to transmit location information simultaneously with voice on the voice channel. The location information is obtained from the U.S. Government's Global Positioning System (GPS) which is built-in to a handset using a highly miniaturized GPS chip and antenna. IDC's technology can transmit longitude, latitude, altitude, time, direction and speed to a Public Safety Answering Point (PSAP) with little impact or modification to existing wireless or wireline carrier networks, or PSAP networks. Data requirements such as altitude, speed and direction exceed the Phase II data requirements.

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March 19, 1999

Via Federal Express 2-Day Air

Mr. Walter Gonzales
Telecommunications Legislative Assistant
Office of Rep. Gene Green
2429 Rayburn HOB
Washington, DC 20515

Re: Handset-Based Approach to the FCC's E911 Phase II Requirements "Accurate, Reliable, Timely, and An Effective Solution for Rural Areas"

Dear Mr. Gonzales:

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